

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

EVELIO DROZ RAMOS  
AUREA ESTHER FRANCO DE DIAZ

DEBTORS

CASE NO. 14-08190/ESL

CHAPTER 13

**DEBTORS' MOTION REQUESTING ORDER  
RE: AUTHORIZATION TO USE FUNDS FROM 2014 TAX REFUND**

TO THE HONORABLE COURT:

**NOW COME, EVELIO DROZ RAMOS and AUREA ESTHER FRANCO DE DIAZ,**  
debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors' proposed Plan dated January 5, 2016, provides that debtors' tax refunds will be paid into the Plan. See docket #59.
2. The debtors have received the 2014 tax refund in the sum of \$1,196.20. Attached is copy of the check, dated April 3, 2016, issued by the Puerto Rico Treasury Department.
3. The debtors respectfully submit to the Court that they need to use these funds to pay for: car repairs expenses in the sum of \$824.00. Attached is copy of car repairs estimate/invoice.
4. The debtors will be paid to the Trustee the unused portion or balance in the sum of \$372.20 to fund their confirmed Plan.
5. The debtors need to use the funds from the 2014 "tax refund" to pay for these reasonable expenses. Furthermore, the debtors are living within a very "tight" budget which barely covers their living expenses and a Plan payment of \$445.00.
5. Based on the above-stated, the debtors respectfully request this Court to Order the

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authorization of the use of these funds to allow the debtors to pay for these expenses with the "tax refund".

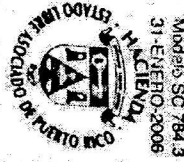
**WHEREFORE**, debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2014 tax refund by the debtors to pay for the above-stated expenses.

**NOTICE:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to debtors, Evelio Droz Ramos and Aurea Aurea Esther Franco De Díaz to their address of record: PO Box 3652, Bayamon, PR 00958.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 25<sup>th</sup> day of April, 2016.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX 787-746-5294  
Email: rfigueroa@rfclawpr.com



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UN MIL CIENTO NOVENTA Y SEIS DOLARES CON 20/100

EVELIO DROZ RAMOS Y  
AUREA FRANCO DIAZ

SECRETARIO DE HACIENDA

*h. Zaegor*

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No. 431

CUSTOMER ORDER NO.		DEPARTMENT		DATE	
Mathews Mechanic		Que No. 1K-24			
NAME		Royal Palm Bay 787-248-5346			
Evelio Diaz					
ADDRESS					
CITY STATE, ZIP					
Doha 940-94 Tab. HWK-664					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RETD.
PAID OUT WHEN SHIP					
1	cheques ligeros acite P/S				
2	" feno (bajos)				
3					
4					
5					
6					
7	1	cremallera			260.00
8	1	acite P/S			6.00
9		2 lineas			35.00
10	1	bomba feno			140.00
11	1	pad feno delantero			58.00
12	1	" " trasero			32.00
13	1	kit caliper trasero			54.00
14	1	liquido feno			9.00
15					594.00
16					
17					
18	Labor				230.00
19					824.00
20					
21					
22					

ORIGINAL